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June 21, 1999

VIA OVERNIGHT DELIVERY

Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, N.W.
Suite TW-A325
Washington, D.C. 20554

RECEIVED

JUN 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Starpower's Virginia IntraLATA Toll Dialing Parity Implementation Plan,
File No. NSD-L-98-121, CC Docket 96-98

Dear Ms. Salas:

Enclosed for filing with the Federal Communications Commission ("Commission") is an original and four copies of Starpower Communications, LLC's ("Starpower") "Virginia IntraLATA Presubscription Implementation Plan" ("Plan") filed with the Virginia State Corporation Commission ("SCC") on April 21, 1999. Pursuant to the Commission's June 18, 1999 Public Notice, Starpower has enclosed two additional copies of the Plan for Mr. Al McCloud of the Commission's Network Services Division.

The SCC has not yet approved any intraLATA toll dialing parity plans. Starpower, therefore, files its Plan in order to conform to the Commission's Order, released on March 23, 1999, directing local exchange carriers ("LECs") to file their plans with the Commission on June 22, 1999, if "a state commission has not yet acted on a LEC's intraLATA toll dialing parity implementation plan."¹

¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order, CC Docket 96-98, NSD File No. L-98-121, FCC 99-54 (rel. March 23, 1999).

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Thank you for your attention to this matter. Should you have any questions, do not hesitate to contact me at (202) 424-7877.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward W. Kirsch". The signature is fluid and cursive, with the first name "Edward" being more prominent.

Edward W. Kirsch
Counsel for Starpower Communications, LLC

Enclosures

cc: Joseph A. Kahl (w/enc.)
Russell M. Blau, Esq. (w/enc.)
Morton J. Posner, Esq. (w/enc.)

STARPOWER COMMUNICATIONS, LLC

VIRGINIA INTRALATA PRESUBSCRIPTION IMPLEMENTATION PLAN

RECEIVED

JUN 22 1999

INTRODUCTION

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Starpower Communications, LLC ("Starpower") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where Starpower is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

Starpower will deploy two PIC ("Primary Interexchange Carrier") technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and interLATA services. Starpower will implement the two PIC technology and this Plan not later than thirty (30) days after July 21, 1999.

Appropriate tariffs will be revised and filed in accordance with this plan.

Starpower will offer customers the ability to access any participating carriers by dialing the appropriate access code (10XXX/101XXXX).

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only, or both intraLATA and interLATA service.

Starpower will notify potential carriers prior to the initial availability of presubscription in specific market areas. Carriers will have the option of participating in all market areas or in a specific market area. Carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s). These documents will be provided to carriers as part of the Starpower carrier correspondence process.

Starpower will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to Starpower.

CALL ELIGIBILITY/TOLL DIALING PLAN

A local service customer of Starpower will have calls routed according to the following plan:

If a Starpower Customer Dials:	The Call is Handled By/Routed to:
911	PSAP on originating line number
411/555-1212	ILEC Directory Assistance Operator
611	Starpower Repair Center
0-	Starpower Operator
0 + interexchange	IntraLATA Toll Provider
1 + 7 or 10 digits	IntraLATA Toll Provider
0 + 7 or 10 digits interexchange	IntraLATA Toll Provider
10XXX or 101XXXX + 0-	XXX/XXXX Carrier
10XXX or 101XXXX + 0 + 7 or 10 digits	XXX/XXXX Carrier
10XXX or 101XXXX + 7 or 10 digits	XXX/XXXX Carrier

If a Starpower customer originates a call to a carrier Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to a carrier Operator by dialing an access code (i.e., 10XXX/101XXX + 0-), the call will be routed to the XXX/XXXX carrier. In both cases, the carrier's switch is responsible for routing this call to the carrier's Operator or to an announcement.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier ("LEC") Access Tandem(s). Following conversion, direct trunks between the Starpower switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place (or ordered) between their point of presence and the incumbent LEC Access Tandem(s).

Starpower will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

Starpower will inform its existing subscriber base that they may select a participating carrier for carriage of intraLATA toll traffic as soon as possible following plan approval. A neutrally-worded billing insert will be used to effectuate this notice.

Starpower customer contact representatives will process customer initiated PIC selections to Starpower or to an alternative intraLATA carrier. Carriers will have the option of allowing the Starpower representatives to process PIC requests on their behalf.

Starpower will not ballot or allocate their customer base.

Alternative carriers may submit PIC changes to Starpower via fax/paper interface. Details regarding this process will be provided as part of our carrier correspondence.

Starpower will accept as a bona fide PIC a selection of "NO PIC" as a choice. "NO PIC" customers will have access code dialing capability to reach participating intraLATA carriers.

Starpower will provide customers with a confirmation notification of their PIC (Starpower or an alternative carrier) selection.

Starpower customer contact representatives will not dissuade or comment on a customer's choice of its intraLATA PIC when the customer contacts Starpower to change the PIC. Starpower customer contact representatives will respond to customer inquiries about intraLATA carriers in a competitively neutral fashion. If a customer requests information relating to carriers other than Starpower, a list of participating carriers will be read to that customer in random order by Starpower representatives.

If the intraLATA toll carrier selected by the customer permits Starpower to process orders on its behalf, Starpower will accept the PIC change request. If a customer selects an intraLATA toll carrier that does not allow Starpower to process PIC changes on its behalf, Starpower will provide the customer with the carrier's toll-free number (if provided by the carrier).

Starpower representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

Starpower representatives will not initiate or accept three-way calls from alternative carriers to discuss presubscription.

PRESUBSCRIPTION INFORMATION

A five dollar PIC change charge will be incurred and billed to the customer for each eligible line, and for each PIC, where a PIC change is made. Starpower will offer its existing customers a 90-day grace period from the date of Starpower's implementation of intraLATA equal access to make a "free" presubscription selection. Customers may change intraLATA carriers only one time during the 90-day grace period without a PIC change charge. After the 90-day grace period, Starpower will assess the five dollar PIC charge. Starpower offers carriers the option of having the PIC charge billed to the carrier or to the customer.

New line customers, including customers adding lines, must affirmatively select their presubscribed IntraLATA carrier. New line customers will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. If a customer cannot decide upon an intraLATA carrier at the time of order, Starpower will extend a 30-day period following placement of the customer's service order for the customer to select an intraLATA carrier without charge. Such a customer will be assigned a NO PIC designation in the interim. After this 30-day period, Starpower will assess the five dollar PIC charge as described above for presubscription selection. Customers assigned a NO PIC designation as set forth in this paragraph will be required to dial an access code to reach an intraLATA carrier's network.

In an effort to reduce unauthorized PIC changes, Starpower will offer intraLATA PIC Freeze service to all customers at no charge. PIC Freeze can only be initiated (or removed) by the customer requesting it through their Starpower representative. Starpower will not engage in the active marketing of the PIC-freeze option until after the completion of the 90-day grace period during which customers may select an intraLATA toll provider without charge.

If a Starpower customer denies requesting a change in intraLATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency signed by the customer, the intraLATA carrier will be assessed a thirty dollar charge for the unauthorized PIC change.

Starpower will process intraLATA and interLATA PIC selections in the same manner and under the same intervals of time.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) 960 byte format via paper medium. Starpower will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to Starpower and retain their incumbent LEC telephone number(s), Starpower, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the Starpower telephone number.